

1 Jeffrey L. Hartman, Esq.
2 Nevada Bar No. 1607
3 **HARTMAN & HARTMAN**
4 510 W. Plumb Lane, Suite B
5 Reno, NV 89509
6 T: (775) 324-2800
7 F: (775) 324-1818
8 notices@bankruptcyreno.com

9 Michael S. Budwick, Esq. #938777 – Admitted *Pro Hac Vice*
10 Solomon B. Genet, Esq. #617911 – Admitted *Pro Hac Vice*
11 Meaghan E. Murphy, Esq. #102770 – Admitted *Pro Hac Vice*
12 Gil Ben-Ezra, Esq. #118089 – Admitted *Pro Hac Vice*
13 Alexander E. Brody, Esq. #1025332 – Admitted *Pro Hac Vice*
14 **MELAND BUDWICK, P.A.**
15 3200 Southeast Financial Center
16 200 South Biscayne Boulevard
17 Miami, Florida 33131
18 T: (305) 358-6363
19 F: (305) 358-1221
20 mbudwick@melandbudwick.com
21 sgenet@melandbudwick.com
22 mmurphy@melandbudwick.com
23 gbenezra@melandbudwick.com
24 abrody@melandbudwick.com

25 Attorneys for Christina W. Lovato, Chapter 7 Trustee

26 **UNITED STATES BANKRUPTCY COURT**
27 **DISTRICT OF NEVADA**

28 In re
1 DOUBLE JUMP, INC.
2
3 Debtor.

4 Lead Case No.: BK-19-50102-gs
5 (Chapter 7)

6 Substantively consolidated with:

19-50130-gs	DC Solar Solutions, Inc.
19-50131-gs	DC Solar Distribution, Inc.
19-50135-gs	DC Solar Freedom, Inc.

7 CHRISTINA W. LOVATO,

8 Plaintiff,

9 v.

10 KING SOLARMAN, INC., CHIANG LIAN
11 CUNG a/k/a MICHAEL CUNG, KING
12 SOLARMAN (INDION) FUND I, LLC, and
13 KING SOLARMAN (INDION) FUND II,
14 LLC,

15 Defendant(s).

16 Adversary No.: 21-05028-gs

17 **STATUS REPORT PURSUANT TO THIS**
18 **COURT'S ORDER DIRECTING**
19 **SUBMISSION OF STATUS REPORT AND**
20 **SETTING STATUS CONFERENCE [ECF**
21 **NO. 116]**

22 Christina W. Lovato, as chapter 7 trustee and plaintiff (“*Trustee*”) in the above-captioned
23 adversary proceeding (“*Adversary*”), together with the above-captioned defendant (“*Defendant*,”)
24 and with the Trustee, the “*Parties*”) provide this status report pursuant to this Court’s Order
25 directing submission of status report [ECF No. 116] which followed this Court’s status hearing

1 conducted on August 11, 2022.
2

3 **I. Status of Adversary Proceeding**

4 As reflected on the docket, the Trustee has filed an operative complaint, the Defendant has
5 filed an Answer (which includes affirmative defenses), and the Court has entered a Scheduling
6 Order. The Parties have been in direct communication and have begun the process of written
7 discovery. The Parties have also begun communicating about deposition discovery.
8

9 As also reflected on the docket, the Trustee filed a motion for partial summary judgment
10 but has voluntarily withdrawn that motion without prejudice.
11

12 **II. Status Conference**

13 The Parties do not believe that a status conference is necessary on October 6, 2022.
14 However, the Parties expect that a status conference approximately 45 days from October 6, 2022
15 will be productive, and request one at that time subject to the Court's availability.
16

17 DATED: September 28, 2022.
18

19 **HARTMAN & HARTMAN**

20 */s/ Jeffrey L. Hartman*
21 Jeffrey L. Hartman, Esq.,
22 *Attorney for Plaintiff Christina W. Lovato*

23 **MELAND BUDWICK, P.A.**

24 */s/ Meaghan E. Murphy*
25 Michael S. Budwick, Esq., Admitted Pro Hac Vice
26 Solomon B. Genet, Esq., Admitted Pro Hac Vice
27 Meaghan E. Murphy, Esq., Admitted Pro Hac Vice
28 Gil Ben-Ezra, Esq., Admitted Pro Hac Vice
Alexander E. Brody, Esq., Admitted Pro Hac Vice
Attorneys for Plaintiff Christina W. Lovato

23 **DIEMER & WEI, LLP**

24 */s/ Kathryn S. Diemer*
25 Kathryn S. Diemer, Esq.,
26 *Attorney for Defendant King Solarman, Inc.*

1 **LAW OFFICE OF MICHAEL B. NISHIYAMA**
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/s/ *Michael B. Nishiyama* _____
Michael B. Nishiyama, Esq.,
Attorney for Defendant Michael Cung

CERTIFICATE OF SERVICE

I certify that on September 28, 2022, I caused to be served the following document(s):

**STATUS REPORT PURSUANT TO THIS COURT'S ORDER
DIRECTING SUBMISSION OF STATUS REPORT AND SETTING
STATUS CONFERENCE [ECF NO. 116]**

I caused to be served the above-named document(s) as indicated below:

✓ a. Via ECF to:

ALEXANDER E. BRODY abrody@melandbudwick.com
ltannenbaum@melandbudwick.com ltannenbaum@ecf.courtdrive.com
mrbnefs@yahoo.com
MICHAEL S. BUDWICK mbudwick@melandbudwick.com,
ltannenbaum@melandbudwick.com; ltannenbaum@ecf.courtdrive.com
CHRISOPHER PATRICK BURKE attycburke@charter.net
SOLOMON B. GENET sgenet@melandbudwick.com
ltannenbaum@melandbudwick.com ltannenbaum@ecf.courtdrive.com
JEFFREY L. HARTMAN notices@bankruptcreno.com,
abg@bankruptcreno.com
PAUL J. JOHNSON pjohnson@diemerwir.com
ALEXANDER J. LEWICKI alewicki@diemerwei.com
CHRISTINA W. LOVATO trusteelovato@att.net, NV26@ecfcbis.com

✓ b. Via Direct Email to:

Kathryn S. Diemer, Esq.
kdiemer@diemerwei.com

✓ c. Via U.S. Mail, postage prepaid, addressed to:

KATHRYN S. DIEMER	MICHAEL B. NISHIYAMA
55 S MARKET STREET	39510 PASEO PADRE PARKWAY,
SUITE 1420	SUITE 300
SAN JOSE, CA 95113	FREMONT, CA 94538

I declare under penalty of perjury that the foregoing is true and correct.

DATED: September 13, 2022.

/s/ Meaghan E. Murphy, Esq.
Meaghan E. Murphy, Esq.